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6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9
10 United States of America,

11 Plaintiff,

12 v.

13 PCPLV LLC d/b/a Pinnacle Compounding
14 Pharmacy, Ofir Ventura, Cecelia Ventura,
Brandon Jimenez, Robert Gomez, Gomez
15 & Associates, Inc., Rock'n Rob
Enterprises, Amir Shalev, D.P.M., AS
16 Enterprises, Inc., and Ivan Lee Goldsmith,
M.D.,

17 Defendants.
18

Case No. 2:21-cv-00184-JCM-DJA

19
20 **JOINT MOTION FOR EXTENSION OF**
21 **TIME**
22 **(SECOND REQUEST)**

23 Plaintiff UNITED STATES OF AMERICA and Defendants PCPLV LLC, OFIR
24 VENTURA, CECELIA VENTURA, and BRANDON JIMENEZ ("Defendants"), by and through
25 their counsel, hereby jointly move the Court to extend the time for Defendants to file an answer or
26 other responsive pleading to Plaintiff's complaint by an additional 21 days. This is the second
27 request to extend this deadline and is based on the following:

- 28
1. On October 3, 2023, this Court extended by 60 days, up through and including January 26, 2024, Defendants' time to file an answer or other responsive pleading to Plaintiff's complaint. This was the first extension of time of this deadline.

1 2. Plaintiffs and Defendants continue to engage in productive settlement discussions and
2 believe that extending the January 26, 2024 deadline by an additional 21 days, up
3 through and including February 16, 2024, will assist their ongoing settlement
4 discussions.

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6 DATED: January 9, 2024

Respectfully submitted,

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8 BY: /s/ Peter S. Christiansen
9 PETER S. CHRISTIANSEN, ESQ.
10 Attorney for Defendants PCPLV LLC,
 OFIR VENTURA, and CECELIA VENTURA

11 BY: /s/ Michael V. Cristalli
12 MICHAEL V. CRISTALLI, ESQ.
13 Attorney for Defendant BRANDON JIMENEZ

14 BY: /s/ Summer A. Johnson
15 SUMMER A. JOHNSON
16 Assistant United States Attorney
17 Attorney for Plaintiff UNITED STATES

18 **IT IS SO ORDERED:**

19 
20 _____
21 DANIEL J. ALBREGTS
22 UNITED STATES MAGISTRATE JUDGE

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28 DATED: 1/10/2024

CERTIFICATE OF SERVICE

Pursuant to FRCP 5, LR IC4-1, and LR 5-1, I hereby certify that I am an employee of Clark Hill PLLC, and that on the 9th day of January 2024, I caused to be served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME (SECOND REQUEST)** in the following manner:

The Court's Electronic Filing System to all parties on the current service list.

/s/ Tanya Bain

An Employee of CLARK HILL PLLC